Washington State University Pullman Stormwater Management Program Plan 2026

The Washington State University (WSU) Pullman Stormwater Management Program (SWMP) Plan has six elements derived from the Eastern Washington Phase II Municipal Stormwater Permit. WSU Pullman shall meet all regulatory requirements for Secondary Permittees in this Phase II Municipal Stormwater Permit.

The overall goal for this Program is to prevent and minimize stormwater pollution and to manage stormwater as a resource more efficiently and effectively.

Please note that paraphrased sections from the Phase II Municipal Stormwater Permit are in regular font, and the *WSU Pullman sections are in italics.*

Program and Permit Elements

1. Public Education and Outreach (S6.D.1)

Goal
To promote awareness and support for stormwater management activities among students, tenants and residents and to show how they can prevent stormwater pollution.

Permit Elements
1.a: WSU Pullman shall implement the following stormwater education strategies:
Storm drain inlets (catch basins) owned and operated by WSU Pullman that are located in maintenance yards, in parking lots, along sidewalks, and at pedestrian access points shall be clearly and permanently labeled with a message similar to “Dump No Waste Drains to waterbody.”

> ***Description of program activities:*** *Currently all catch basins are labeled on campus. Catch basins that are found to have labels removed or damaged are placed on a list for relabeling when weather permits. Facilities Services maintains a database of catch basin locations.*

As identified during visual inspection and regular maintenance of storm drain inlets per the requirements of S6.D.3.d and S6.D6.a below, or as otherwise reported to WSU Pullman, any inlet having a label that is no longer clearly visible and/or easily readable shall be re-labeled within 90 days.

> ***Description of program activities:*** *Snow plows and street sweepers occasionally remove or deface the labels attached to catch basins. As a result, Environmental Health & Safety reinstalls the labels as needed.*

1.b: Each year WSU Pullman shall distribute educational information to tenants and residents on the impact of stormwater discharges on receiving waters, and steps that can be taken to reduce pollutants in stormwater runoff. Distribution may be by hard copy or electronic means. Appropriate topics may include:

- How stormwater runoff affects local waterbodies;
- Proper use and application of pesticides and fertilizers *(not relevant to WSU Pullman tenants and residents)*;
- Benefits of using well-adapted vegetation *(not relevant to WSU Pullman tenants / residents)*;
- Alternative equipment washing practices including cars and trucks that minimize pollutants in stormwater;
- Benefits of proper vehicle maintenance and alternative transportation choices; and proper handling and disposal of wastes, including the location of hazardous waste collection facilities in the area;
- Hazards associated with illicit connections;
- Benefits of litter control and proper disposal of pet waste; and
- Source control BMPs for building materials to reduce pollution to stormwater; including, but not limited to, stormwater pollution from PCB-containing materials *(not relevant to WSU Pullman tenants / residents)*.

Description of program activities: *Each year Housing sends an email announcement to residents on campus directing them to the EHS stormwater website that has educational links at https://ehs.wsu.edu/environmental-issues/ph-stormwatermanagement/. EHS sends the same email announcement to the tenants on campus (USDA). Food vendor tenants on campus are not capable of contaminating stormwater based on their location and operation inside buildings, therefore no information was provided to them. EHS will continue to update the stormwater website and send out educational information via emails.*

2. Public Involvement and Participation (S6.D.2)

Goal

To promote and facilitate faculty, staff, student and public participation and involvement in the WSU Pullman SWMP Plan and planning process including: 1) creating opportunities for the public to participate in the decision making processes involving the development; 2) implementation and update of WSU Pullman's SWMP Plan; 3) development and adoption of all required ordinances, and; 4) receipt and consideration of information on construction site stormwater runoff control.

Permit Elements

Each year no later than May 31 WSU Pullman shall:

2.a: Make the annual report available on the website.

2.b: Make the latest updated version of the SWMP Plan available on the website.

Description of program activities: *The annual report and updated SWMP are posted on the WSU website each year. In 2024, WSU Pullman and WSU Spokane stormwater management websites were combined into one joint website at https://ehs.wsu.edu/environmental-issues/ph-stormwatermanagement/ The annual report also provides a summary of the implementation of the TMDL.*

3. Illicit Discharge Detection and Elimination (S6.D.3)

Goal

To identify and eliminate illicit discharges to WSU Pullman's storm sewer system, thereby improving local surface water quality.

Permit Elements

3.a: WSU Pullman shall comply with all relevant ordinances, rules, and regulations of the City of Pullman that govern non-stormwater discharges (illicit discharges for example).

> ***Description of program activities:*** *WSU Pullman is in compliance with this ordinance.*

3.b: WSU Pullman shall implement appropriate policies prohibiting illicit discharges, and an enforcement plan to ensure compliance with the illicit discharge policies. These policies shall address, at a minimum: illicit connections; non-stormwater discharges, including spills, of hazardous materials; and improper disposal of pet waste, and litter. Policies shall be revised, if necessary, to meet the requirements of this section no later than July 1, 2027.

> ***Description of program activities:*** *WSU Pullman developed and published the enforcement policy in the Safety Policies and Procedures Manual 6.58 Stormwater Management. This policy was revised in September 2021.*

3.c: WSU Pullman shall maintain a storm sewer system map showing the locations of all known storm drain outfalls and discharge points, labeling the receiving waters, other than groundwater, and delineating the areas contributing runoff to each outfall and discharge point (defined as the location where a discharge leaves the Permittee's MS4 through the Permittee's MS4 facilities/BMPs designed to infiltrate). Make the map available on request to Ecology, and to the extent appropriate, to other Permittees. No later than 12-31-26, the required format for mapping is an electronic format with fully described mapping standards. No later than 3-31-27, submit locations of all known MS4 outfalls according to the standard templates and format provided in the Annual report. This reporting shall include the size and material of the outfalls.

> ***Description of program activities:*** *WSU Pullman has developed electronic GIS maps of the system, and Facilities Services and EHS continue to verify, and make updates to the maps as needed. Due to the low permeability of soils in Pullman, discharge points are not present on campus.*

3.d: WSU Pullman shall conduct field inspections and visually inspect for illicit discharges at all known outfalls and discharge points. WSU Pullman shall visually inspect at least one third (on average) of all known outfalls and discharge points each year. Implement procedures to identify and remove any illicit discharges and keep records of inspections and follow-up activities.

> ***Description of program activities:*** *WSU Pullman inspects at least one third of outfalls annually, performs sampling as needed or required, documents any illicit discharges, and eliminates them immediately if possible or as funding allows depending on the cost, and keeps*

records. EHS shall continue to visually inspect outfalls on an annual basis, and perform sampling as needed.

When illicit discharges are identified, depending on the severity, either DOE will be contacted (per the permit section S4.F.1 [if the discharge reaches surface waters] and/or G3] if the discharge just reaches the storm sewer system but not surface waters]) or the discharge will be logged into our database and reported at the end of the year in the annual report. In addition, EHS uses the Dept. of Ecology ERTS form to report illicit discharges as needed. Corrective actions are enforced when human or mechanical error is what caused the discharge. Illicit connections that are identified, which are not easily fixed, are added to the WSU Pullman Minor Capital Safety budget for future correction. In the interim, users in the areas where these illicit connections exist are advised not to discharge anything into these illicit connections if feasible.

3.e: WSU Pullman shall implement a spill response plan that includes coordination with a qualified spill responder.

Description of program activities: *WSU Pullman has developed and implemented a spill response plan that includes coordination with a qualified spill responder. WSU Pullman also has Spill Prevention, Control and Counter Measure (SPCC) Plan training that is required for applicable employees. The online training transcript is kept by HRS via Precipio.*

3.f: WSU Pullman shall provide staff training or coordinate with existing training efforts to educate staff on proper best management practices for preventing illicit discharges, and train all Permittee staff who, as a part of their normal job responsibilities, have a role in preventing such illicit discharges.

Description of program activities: *EHS conducts staff training on proper best management practices to help prevent illicit discharges as needed.*

4. Construction Site Stormwater Runoff Control (S6.D.4)

Goal
To prevent the discharge of sediment, erosion, and other construction related pollutants from construction sites.

Permit Elements
WSU Pullman shall:
4.a: Comply with all relevant ordinances, rules, and regulations of the City of Pullman that govern construction phase stormwater pollution prevention measures.

Description of program activities: *WSU Pullman and the City of Pullman developed an interagency agreement in order for the university to meet the City Code without requiring City approval and inspections for applicable projects. EHS submits an annual report to the City detailing what projects were constructed in the previous year and what activities (inspections, reports, enforcement actions, etc.) were performed. The most current report was submitted to the City on February 12, 2026.*

4.b: Ensure that all construction projects under the control of WSU Pullman which require a construction stormwater permit obtain coverage under the NPDES General Permit for Stormwater Discharges Associated with Construction Activities.

> ***Description of program activities:*** *WSU Pullman is in compliance with this requirement for applicable projects. EHS obtains the permit from the Department of Ecology and transfers it to the contractor for the duration of the project. EHS reviews and approves Stormwater Site Plans and Stormwater Pollution Prevention Plans. EHS inspects the BMPs on site until the project is completed. EHS also submits a Notice of Termination to Ecology. Currently the only construction project that is permitted is the Schweitzer Engineering Building. Heald Hall demolition will require a permit and work is scheduled to begin in 2026 and finish in 2027.*

4.c: Coordinate with the City of Pullman regarding projects owned and operated by other entities which discharge into the WSU Pullman's storm sewer system, to assist the City with achieving compliance with all relevant ordinances, rules, and regulations of the City.

> ***Description of program activities:*** *WSU Pullman has been and will continue to be in compliance with this requirement for applicable projects.*

4.d: Provide training or coordinate with existing training efforts to educate relevant staff in erosion and sediment control BMPs and requirements or hire trained contractors to perform the work.

> ***Description of program activities:*** *For projects that require an NPDES General Permit for Stormwater Discharges Associated with Construction Activities, Facilities Services hires contractors that have Certified Erosion and Sediment Control Leads (CESCLs) on call 24 hour a day as required by the Permit. WSU Pullman also has CESCLs to oversee construction projects. EHS provides training to Facilities Services staff on construction BMPs, and the permitting process as needed.*

4.e: Coordinate as requested with Ecology or the City of Pullman to provide access for inspection of construction sites or other land disturbances, which are under the control of WSU Pullman during the land disturbing activities and/or construction period.

> ***Description of program activities:*** *WSU Pullman is in compliance with this requirement for applicable projects. In 2025 Ecology and the City of Pullman did not request access for inspections.*

5. Post-Construction Stormwater Management for New Development and Redevelopment (S6.D.5)

Goal

To control stormwater runoff pollutants and flow from new development and redevelopment projects.

Permit Elements

5.a: WSU Pullman shall comply with all relevant ordinances, rules and regulations of the City of Pullman that govern post-construction stormwater pollution prevention measures.

Description of program activities: *WSU Pullman and the City of Pullman developed an interagency agreement in order for WSU Pullman to meet the City Code without requiring City approval and inspections for applicable projects. EHS submits an annual report to the City detailing what projects were constructed in the previous year and what activities (inspections, reports, enforcement actions, etc.) were performed. The most current report was submitted to the City on February 12, 2026.*

5.b: WSU Pullman shall coordinate with the City of Pullman regarding projects owned or operated by other entities which discharge into WSU Pullman's storm sewer system, to assist the City with achieving compliance with all relevant ordinances, rules, and regulations of the City.

Description of program activities: *WSU Pullman is in compliance with this requirement for applicable projects.*

6. Pollution Prevention and Good Housekeeping for Municipal Operations (S6.D.6)

Goal

To reduce pollutant loading in stormwater runoff from roadways, parking areas, maintenance and storage yards, vehicle fleets, parks, impervious surfaces, etc.

Permit Elements

6.a: WSU Pullman shall implement a municipal operation and maintenance (O&M) plan to minimize stormwater pollution from activities conducted by the university. The O&M Plan shall include appropriate pollution prevention and good housekeeping procedures for all of the following operations, activities, and/or types of facilities that are present within WSU Pullman's boundaries, and under the functional control of WSU Pullman. The O&M Plan shall be updated, as needed, no later than July 1, 2027.

i. *Stormwater collection and conveyance system, including catch basins, stormwater pipes, open channels, culverts, and stormwater treatment and/or flow control BMPs and facilities.* The O&M Plan shall address, at a minimum: scheduled inspections and maintenance activities, including cleaning and proper disposal of waste removed from the system. WSU Pullman shall properly maintain stormwater collection and conveyance systems owned and operated by the university, and regularly inspect and maintain all stormwater facilities to ensure facility function.

   WSU Pullman shall establish maintenance standards that are as protective as or more protective of facility function than those specified in the *Stormwater Management Manual for Eastern Washington*.

   WSU Pullman shall review their maintenance standards to ensure they are consistent with the requirements of this section.

   Description of program activities: *WSU Pullman is in compliance with these requirements.*

   WSU Pullman shall conduct spot checks of potentially damaged permanent stormwater treatment and flow control facilities following major storm events (24 hour event with a 10 year or greater recurrence interval).

Pullman receives 2.0 inches of precipitation in a 10-year 24-hour storm per the Eastern WA Stormwater Manual Figure 4.9 Isopluvial Map. However, no storms involving 2.0 inches of precipitation in a 24-hour period occurred in Pullman in 2024. Therefore spot checks were not performed. WSU Pullman will continue to monitor forecasts for 10-year 24-hour storm events and conduct spot checks afterwards as necessary.

ii. *Roads, highways, and parking lots.* The O&M Plan shall address at a minimum: deicing, anti-icing, and snow removal practices; snow disposal areas; material (e.g., salt, sand, or other chemical) storage areas; all-season BMPs to reduce road and parking lot debris, and other pollutants from entering the MS4.
iii. *Vehicle fleets.* The O&M Plan shall address at a minimum: storage, washing, and maintenance of WSU Pullman's vehicle fleets; and fueling facilities. WSU Pullman shall conduct all vehicle and equipment washing and maintenance in a self-contained covered building or in designated wash and/or maintenance areas.
iv. *External building maintenance.* The O&M Plan shall address at a minimum: building exterior cleaning and maintenance including cleaning, washing, painting; maintenance and management of dumpsters; and other maintenance activities. For buildings owned by WSU Pullman and built between the years 1950 and 1980, the O&M Plan shall include building material assessment for PCBs consistent with *How to Find PCBs in Building Materials* (Ecology, 2024; Publication No. 22-040-024) prior to routine exterior building washdown to the MS4. Structures confirmed or suspected to have PCB-containing materials shall not discharge washdown to the MS4.
v. *Preparing buildings for renovation or demolition.* The O&M Plan shall address Source Control BMPs for building materials to prevent PCBs from entering the MS4 in preparation for and during demolition and renovations.
vi. *Parks and open spaces.* The O&M Plan shall address at a minimum: proper application of fertilizer, pesticides, and herbicides; sediment and erosion control; BMPs for landscape maintenance and vegetation disposal; and trash management.
vii. *Material storage facilities and heavy equipment maintenance or storage yards.* WSU Pullman shall develop and implement a Stormwater Pollution Prevention Plan (SWPPP) to protect water quality at each of these facilities owned or operated by the university and not covered under the Industrial Stormwater General Permit or another NPDES permit that authorizes stormwater discharges associated with the activity.
viii. *Other facilities that would reasonably be expected to discharge contaminated runoff.* The O&M Plan shall address proper stormwater pollution prevention practices for each facility.

Description of program activities: *WSU Pullman has developed, implemented, and updated Stormwater O&M Plans, and develops new plans as deemed appropriate. Facilities Services: 1) performs maintenance at the University's stormwater flow control ponds; 2) cleans catch basins; 3) replaces deteriorated catch basin labels as needed, and; 4) regularly inspects stormwater BMPs to ensure facility function.*

WSU Pullman was already required to meet external building maintenance and preparing buildings properly for renovation or demolition so that PCBs and lead paint are not discharged.

6.b: WSU Pullman shall have permit coverage for all facilities operated by WSU Pullman that are required to be covered under the Industrial Stormwater General Permit or another NPDES permit that authorizes surface water discharges associated wit the activity.

Description of program activities: *WSU Pullman currently does not have any facilities that are required to be covered under these Permits. If required, WSU Pullman will obtain permits for facilities that meet these Permit requirements.*

6.c: The O&M Plan shall include sufficient documentation and records as necessary to demonstrate compliance with the O&M Plan requirements in S6.D.6.a.(i) through (viii) above.

Description of program activities: *WSU Pullman is in compliance with this requirement.*

6.d: WSU Pullman shall implement a program designed to train all employees whose construction, operation, or maintenance job functions may impact stormwater quality. The training shall address:

i. The importance of protecting water quality.
ii. The requirements of this Permit.
iii. Operation and maintenance requirements.
iv. Inspection procedures.
v. Ways to perform their job activities to prevent or minimize impacts to water quality.
vi. Procedures for reporting water quality concerns, including potential illicit discharges and spills.

Description of program activities: *EHS provides on-going training to applicable employees as needed and assists departments with their O&M Plan requirements.*

7. Compliance with Total Maximum Daily Load (TMDL) Requirements

A.1: WSU Pullman has TMDL requirements listed in Appendix 2 WSU Pullman shall keep records of all actions required by this Permit that are relevant to applicable TMDLs within the university jurisdiction. The status of the TMDL implementation shall be included as part of the Annual Report submitted to Ecology. Each Annual Report shall include a summary of relevant SWMP and Appendix 2 activities conducted in the TMDL area to address the applicable TMDL parameter(s).

Appendix 2, WRIA 34 – South Fork of the Palouse River Fecal Coliform Bacteria

TMDL Progress Report:

1. Summary of IDDE investigation results by outfall.

Washington State University (WSU) has implemented a Total Maximum Daily Load (TMDL) Quality Assurance Project Plan (QAPP) since 2016 to reduce fecal coliform bacterial loading in local water ways. Since the action plan has been successful in reductions at Benewah Street outfall by identifying and fixing loading issues by eliminating cross connections and instituting Best Management Practices (BMPs). The bacterial loading at Missouri Flat Creek outfall continues to not meet the state limits for recreational waters and is therefore subject to a TMDL QAPP continuance.

2. Summary of source control actions taken by outfall.

Prior source control actions have been successful in reducing bacterial loading to acceptable levels at Benewah Street. The 2025 TMDL plan outlines an investigative approach to identifying biological sources including wildlife and domestic animals prior to further source control actions in the MFC outfall region.

3. Summary of targeted education and outreach efforts completed.

General stormwater pollution prevention education and outreach to residents, tenants and students is completed in March 2026. Future planned education and outreach will continue to be the same with emails sent to residents, tenants and students directing them to the WSU EHS stormwater web site which has educational materials posted.

In addition, stormwater tours for undergraduate and graduate classes have been conducted to educate students on WSU specific infrastructure and information.

4. Any proposed updates or revisions to the 5-Year Action Plan:

The approved 2025 TMDL Action Plan timeline has been revised to reflect the time requirements in setting up a graduate lab at WSU to conduct the proposed DNA analysis in the Chief Joe Pond system that collects significant runoff from campus prior to feeding into the MFC outfall system. DNA analysis is currently set to begin in spring of 2026. A total of 6 grab samples will be taken quarterly and tested for E. Coli with first samples submitted March 2026, results pending.

In addition, sampling sites at Chief Joe Pond system have been changed from those proposed in the initial TMDL Action Plan. After further site and system investigations, the following sites were initially sampled to ensure information is Chief Joe Pond system specific data.

1. Valley Roads Fields parking lot inlet area at pond (originally proposed site)
2. Upper Pond Inlet (changed from storm drain near student housing)
3. Pre-Bioswale (changed from storm drain located by valley road fields)
4. Post Bioswale (originally proposed site)
5. Chief Joe Pond outlet (originally proposed site)
6. 6. MFC Outfall (originally proposed site

TMDL Action Plan progress:

1. Working with WSU environmental engineering professor, Huiyun Wu, and graduate student to build lab to conduct microbial DNA analysis for grab samples from Chief Joe.
    a. Huiyun Wu was identified as WSU expert in stormwater microbial analysis. She was successfully recruited to conduct the microbial DNA analysis on campus.
    b. Microbial DNA testing lab equipment has been purchased and appropriate accounts have been established.
    c. Graduate students are currently being trained in analysis techniques.
2. To prevent further delays in data collection to better understand the MFC outfall bacterial counts, EHS has begun sampling for E. coli enumeration. Sampling sites have been finalized and grab samples have been submitted in first quarter 2026, results pending.